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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

1 KIMAKO STRICKLAND,

2 Plaintiff,

3 vs.

4 CENLAR F.S.B.; CITIMORTGAGE,
5 INC. and DOES 1-10, inclusive,

6 Defendants.

Case No. 2:23-cv-00697-DJC-KJN

JOINT STIPULATION
EXTENDING EXISTING
DEADLINES BY 30 DAYS

Honorable Daniel J. Calabretta

1 Pursuant to Local Rule 144(a), Plaintiff Kimako Strickland and Defendants
2 CitiMortgage, Inc. and Cenlar FSB (together “Defendants”), by and through their
3 respective counsel of record, hereby stipulate and agree as follows:

4 WHEREAS, on March 14, 2023, Plaintiff filed a complaint against Defendants
5 in the Superior Court of California, San Joaquin County, in the case captioned
6 *Strickland v. Cenlar F.S.B., et al.*, Case No. STK-CV-URP-2023-2469 (the “State
7 Court Action”).

8 WHEREAS, on March 16, 2023, Plaintiff served each Defendant with the
9 summons and complaint in the State Court Action.

10 WHEREAS, on April 13, 2023, Defendants filed a Notice of Removal
11 removing the State Court Action to this Court. ECF No. 1.

12 WHEREAS, Defendants did not file an answer or otherwise respond to the
13 complaint before filing their Notice of Removal. Accordingly, Defendants’ responses
14 to the complaint were due on April 20, 2023, which was seven days after the Notice
15 of Removal was filed. *See* Fed. R. Civ. P. 81(c)(2)(C).

16 WHEREAS, pursuant to Local Rule 144(a), the Parties stipulated to a 28-day
17 extension of time to respond to the Complaint. ECF No. 6.

18 WHEREAS, after entering into their initial stipulation, the Parties began
19 settlement negotiations. To facilitate those discussions, they requested an additional
20 extension of the deadline to respond to the Complaint. ECF No. 10.

21 WHEREAS, the Court allowed the Parties’ stipulated extension, extending the
22 deadline to respond to the Complaint to June 19, 2023, and setting July 19, 2023 as
23 the deadline for the Parties to file a joint status report. ECF No. 11.

24 WHEREAS, the Parties continue to engage in good faith settlement
25 negotiations, which has included an evaluation of Plaintiff’s eligibility for loss
26 mitigation. These settlement efforts are active and ongoing, and the Parties are
27 focusing their efforts on a resolution of this matter that does not require judicial
28 intervention.

1 WHEREAS, the Parties seek to limit unnecessary filings in order to preserve
2 judicial resources and those of the Parties, and so respectfully request that the Court
3 extend the existing case deadlines by 30 days.

4 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by
5 and between the Parties, and through their respective attorneys of record, as
6 follows:

7 1. Defendants shall have up to and including July 19, 2023 to file and serve
8 an answer or motion under Rule 12 to the Complaint; and,

9 2. The Parties shall confer as required by Fed. R. Civ. P. 26(f) and shall
10 prepare and submit to the Court a joint status report that includes the Rule 26(f)
11 discovery plan by August 19, 2023.

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13 **IT IS SO STIPULATED.**

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15 Dated: June 9, 2023

Respectfully submitted,

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MAYER BROWN LLP

By: /s/ Robert C. Double III
Robert C. Double III

Attorneys for Defendant
CitiMortgage, Inc.

Dated: June 9, 2023

WOLFE & WYMAN LLP

By: /s/ Jessica B. Coffield
(as authorized on 6/9/23)
Jessica B. Coffield

Attorneys for Defendant
Cenlar FSB

1 Dated: June 9, 2023

CDLG, PC

2
3 By: /s/Anthony Cara
4 (as authorized on 6/9/23)
Anthony Cara

5 Attorneys for Plaintiff
6 Kimako Strickland

7 **IT IS SO ORDERED.**

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9 Dated: 6/9/23

/s/ Daniel J. Calabretta

10 THE HONORABLE DANIEL J. CALABRETTA
11 UNITED STATES DISTRICT JUDGE
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